

November 26, 2013

Document Processing Desk 6(a)(2)
Office of Pesticide Programs – 7504P
U.S. Environmental Protection Agency
Ariel Ross Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

RE: Section 6(a)(2) October Incident Filing

Dear 6(a)(2) Administrator:

On behalf of Reckitt Benckiser, Scientific & Regulatory Consultants, Inc. (SRC) is submitting the enclosed documents containing alleged adverse effect incidents for products listed below. SafetyCall is a primary gathering source for incidents, though internal reports for calls/correspondence received directly at Reckitt Benckiser are also included. SRC is acting on Reckitt Benckiser's behalf by assisting them in registration actions and their reporting requirements in accordance with FIFRA section 6(a)(2).

The EPA Registration Numbers with adverse effect incidents for this filing are:

- 777-83
- 777-114
- 777-118
- 777-81
- 777-66
- 777-70
- 3282-66
- 777-89

These incidents are being reported in compliance with 40 CFR § 159.184 and have been assigned the H-B or H-C severity classification. If additional information is needed, please feel free to contact us by e-mail (bmacdonald@srcconsultants.com) or by phone at 260-244-6270.

Sincerely,

Bob MacDonald Consultant (SRC)

Agent for Reckitt Benckiser

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Ann M. Kline Consultant (SRC)

Agent for Reckitt Benckiser

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Personal privacy information

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Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information

Row 1 Administrative Data	Reporter Name		Submission date.	Contact perso	n (if difi	ferent than reporter)	Internal ID 1262726
	Address Fairfax, VA 22030 USA			Address			
	Phone #			Phone #			
	Incident Status: New	Location and Fairfax, VA USA Unknown	date of incident	Date registrar became award incident. 10/11/2013		Was incident part of larger study? No	
Row 2 Pesticide(s) Involved	EPA Registration # (Product 1) 3282-66		EPA Registration # (Product 2)			EPA Registration # (Product 3)	
	A.I. (s) Brodifacoum, Brodifacoum		A.I. (s)			A.I. (s)	
	Product 1 name dCON Bait Pellets (non specific)		Product 2 Name			Product 3 Name	
	Exposed to concentrate prior to dilution? No		Exposed to concentrate prior to dilution?			Exposed to concentrate prior to dilution?	
	Formulation		Formulation			Formulation	
Row 3 Incident Circumstances	Evidence label directions were not followed? Yes Intentional misuse? Yes Applicator certified? UNK	yard, school nursery/gree commercial woods, agric	e: (examples included, industrial, enhouse, surface verturf, building/officultural (specify cultural (specify cultur, highway)).	include mixing/loading, reentr transportation, repair/ mainten- application equipment, manufa		ntry, application tenance of ufacturing/	
	How exposed: (examples include direct contact with treated surface, ingestion, spill, drift, runoff) See Incident Description Notes			RE DATE: 11:3	VIEWED	FOR 6(a)2 INITIALS: AK	

Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area Page 2 of 4

Brief description of incident circumstances.

Ferguson, Anna Oct 11 2013 11:02AM CRC transfer

Hx: Caller cannot find EPA# or UPC, but states that the product is dCon with AI brodifacoum. On 10/9/13, he began having abdomal pain, and defecated blood. Pain has persisted, and was particularly bad yesterday, but has improved today. They are a significant distance from ER.

Caller suspects that his son contaminated the stew he ate on 10/8/13 with product, because son has tried similar things in the past to harm him (eg - putting bleach in caller's coffee).

A: These are possible sx of product toxicity. Recommend calling 911 for transport to ER. Have staff call with questions.

Nordaune, Abby Oct 11 2013 6:37PM

Cb from Dr. Bialeck. Phone # 2027452751. She states INR is 1-normal. Would like to know if there are any further recommendations.

A: Product is an LAAC, takes at least 24hrs to start working and 2-5days before sxs present. Transferred to specialist for further rec./information.

Roman, Youssef Oct 11 2013 6:53PM

White, Vicki Oct 13 2013 8:39AM

CB from Robert Sr. He states he knows for a fact that his son put pellets in his stew on 10-8-13. Box was empty and pellets were on the floor. Caller did not notice a bad taste or odd color. 1 day later he experienced 'excessive' rectal bleeding. He was seen at ED but feels that because of his bipolar disease that he was 'made fun of' and not taken seriously. A CAT scan was taken, and blood tests were done. He was told to come back for follow up but does not want to do this. 1 day ago the caller felt very unwell. He ate 4 pieces of raw garlic 1/2' in size, and this made him worse. His lower abdomen was painful and tender to the touch. Today he is constipated and has a headache. He is calling to ask what sxs this product will cause, and if it will cause cancer or prostate problems. He is taking 'a bunch' of laxatives to 'get the poison out'. He is also taking vitamin K as an antidote.

A Explained that the product is a LAAC and will cause bleeding related sxs. Constipation and headaches are not expected. Vitamin K will not help, Vitamin K1 is the antidote for this but it's usually prescription.

You really do need medical follow up today. A PT should show if you have been effected by this product. If you are sure your son did this to you, you should involve the police.

Nordaune, Abby Oct 13 2013 3:33PM

Cb from caller. He states he is extremely constipated and would like to know what the best thing is for him to do. He also states that he felt very lightheaded a little while prior to this call today. He has been taking ducoset and milk of magnesia for constipation. He would like to know what effect consuming raw garlic has on the product, how long the product stays in his system, if product causes colitis, if it causes constipation, if it causes cancer, and what is causing his cancer. He has purchased an enema for constipation, but has yet to use it.

A: This will all be documented and reported, but you need to call the ER to find out when they want you to be seen for f/u PT test as they directed and if they want you to be seen today. Do not use anything else such as an enema to treat at this time. Product causes bleeding, we do not know what the cause of your constipation is, but rec. discussing that with the MD when you go for f/u. Product can stay in the body for months. Garlic is not an antidote, only Vit K1 is by prescription, and we are unable to say what effect, if any, it would have on product ingestion. Toxicity would have to be diagnosed by an MD. Cb prn.

Nordstrom, Dan Oct 14 2013 12:26AM

Hx: Caller states she is an M.D. and conducted a PT test with all results normal. Caller states she inspected stool sample and it was clear. Caller states the pt is now asx.

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A: Thank you for contacting us to report your findings. We will document this for the manufacturer and forward the case report onto them. Callback 24/7 if you have any other questions or concerns, or if you need further toxicological consult.

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Demographic information: Age: 59 Year(s) Sex: Male Occupation (if relevant) NA	Exposure route: Unknown route	Was adverse effect result of suicide/homicide or attempted suicide/homicide? Yes	Was protective clothing worn (specify)? None Reported
If female, pregnant? NA	Was exposure occupational? Not indicated If yes, days lost due to illness: NA	Time between exposure and onset of symptoms: Unable to determine	
Type of medical care sought: (examples include none, clinic, hospital emergency department, private physician, PCC, hospital inpatient). ER/Hospital-treated & released Exposure data: NA Amount of pesticide: NA Exposure duration: Acute < 8hrs Patient weight: Unknown	List signs/symptoms/adverse eff Gastrointestinal-Abdominal Pa Gastrointestinal-Blood per rect Gastrointestinal-Constipation Miscellaneous-Malaise Neurological-Dizziness/vertigo Neurological-Headache	If lab tests were performed, list test names and results (If available, submit reports) None Reported	
Human severity category: HC			

Internal ID# 1262726